

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

WARREN EASLEY,	}	
	}	No. 1:21-cv-00251-SPB-RAL
Plaintiff,	}	
	}	Judge Baxter
vs.	}	
	}	Magistrate Judge Lanzillo
JOHN WETZEL, <i>Secretary of Department of</i>	}	
<i>Corrections</i> ; ET AL.,	}	
	}	<b><i>Electronically Filed.</i></b>
Defendants.	}	

**CORRECTIONS DEFENDANTS' RESPONSE  
TO PLAINTIFF'S MOTIONS TO COMPEL [ECF 69]**

AND NOW, come the defendants, Wetzel, Oberlander, Sawtelle, Adams, Blich, Mongelluzzo, Gill, Beatty, Fajbik, Ferguson, Wright, Caltagarone, Hill, Smith, Bell, Brown, Larson, Deal, Irwin, Haggerty, Weaver, Seaholtz, Hiler, Haag, Smith, McGill, Rankin, Ferdarko, Prinkley, Smith, Shaffer, Klemm and Dittman ("the Corrections Defendants"), by their attorneys, Scott A. Bradley, Senior Deputy Attorney General, and Karen M. Romano, Chief Deputy Attorney General, and respectfully submit the following response to Plaintiff's Motion to Compel [ECF 69]:

1. Warren Easley ("Plaintiff") is a prisoner in the custody of the Pennsylvania Department of Corrections ("DOC"); he is presently confined at the State Correctional Institution at Houtzdale ("SCI-Greene").

2. Plaintiff initiated this *pro se* civil rights action on September 8, 2021, by filing a Motion for Leave to Proceed *in forma pauperis*. See [ECF 1].

3. Plaintiff was granted *in forma pauperis* status, see [ECF 8], and the Complaint [ECF 9] was docketed on November 29, 2021.

4. The Corrections Defendants waived service, see [ECF 33], and filed their Answer [ECF 63] on September 16, 2022.

5. The Court thereafter entered a Case Management Order [ECF 64] on September 22, 2022, setting, *inter alia*, a deadline for discovery.

6. On November 18, 2022, Plaintiff's Motion to Compel was docketed at [ECF 69]. This motion seeks responses to Plaintiff's various requests for discovery, indicating that he had not received any responses to date.

7. The Corrections Defendants have been directed to respond to this motion by November 29, 2022. See Text Order, November 22, 2022 [ECF 71]. This response follows, accordingly.

8. Plaintiff essentially asserts that he has not received responses to his requests for discovery. Undersigned counsel has received Plaintiff's requests but has not yet completed the responses.

9. Initially, although the requests for production of documents are dated October 9, 2022, and interrogatories are dated October 13, 2022, undersigned counsel for the Corrections Defendants did not receive these discovery requests at his office until on or about October 28, 2022, due to changes in OAG mailing procedures implemented as a result of the Covid-19 pandemic.

10. Undersigned counsel has initiated efforts to obtain the various documents requested and secure answers from the several and various defendants to whom interrogatories have been interposed. However, given the number and scope of the requests, the responses have not yet been completed.

11. Additionally, undersigned counsel's efforts have been hampered by staff shortages within the office. Nevertheless, it is anticipated that discovery responses will be completed and provided by the current discovery end date of December 21, 2022. In the event additional time is needed, undersigned counsel will seek an amendment of the Case Management Order [ECF 55].

12. Undersigned counsel apologizes to Plaintiff for this delay in responding; however, such delay is necessary in order to provide full and complete responses to Plaintiff's requests.

WHEREFORE, it is respectfully requested that this Court accept the foregoing response to Plaintiff's Motion to Compel [ECF 69].

Respectfully submitted,

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Date: November 29, 2022

s/ Scott A. Bradley

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